



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT
715 GRANTHAM LANE
NEW CASTLE, DELAWARE 19720-4801

WASTE MANAGEMENT SECTION
SUPERFUND BRANCH

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TELEPHONE: (302) 323-4540
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November 12, 1993

Ms. Kate Lose (3HW42)
U.S. EPA, Region III
841 Chestnut Street
Philadelphia, PA 19107

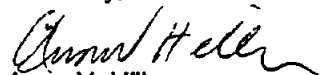
RE: Comments on Draft Proposed Remedial Action Plan
Standard Chlorine of Delaware, Inc. Superfund Site
Delaware City, New Castle County, Delaware

Dear Ms. Lose:

The Department of Natural Resources and Environmental Control has reviewed the draft Proposed Remedial Action Plan for the Standard Chlorine of Delaware, Inc. Superfund site. Overall, the Department believes that the Proposed Plan is nearing completion, but some issues remain to be addressed. Please see the attached general and specific comments on the draft. As mentioned in the attachment, further comments will be forthcoming early next week due to the very short review time (four working days) allowed by EPA and conflicts in reviewers' schedules.

If you have any questions, please contact me at (302) 323-4540.

Sincerely,


Anne V. Hiller
Environmental Scientist III
Superfund Branch

AVH:avh/dew
AVH93094.wp

Attachment

pc: N. V. Raman
Karl Kalbacher

Delaware's good nature depends on you! AR308422

Attachment A

Comments on the Draft Proposed Remedial Action Plan

General Comments

1. Further discussions must be held between members of DNREC, EPA, NOAA, US Fish and Wildlife, etc. to resolve the extent of restoration to occur in the wetlands of Red Lion Creek and the unnamed tributary. DNREC representatives do not believe that active restoration measures (e.g. planting) may be necessary if the wetlands are excavated. Since a discussion of the required activities should be included in the Record of Decision, a meeting should be held soon.
2. Further discussions must be held between members of DNREC, EPA, NOAA, US Fish and Wildlife, etc. to resolve the extent of ecological monitoring that should be completed to assess the success of the remedy at the site. Since a conceptual discussion of the monitoring should be included in the Record of Decision, a meeting should be held soon.
3. Concerns and confusion have arisen regarding the "delisting" of the thermally treated material in Alternative 4. Further comments or questions on this issue will be sent early next week.
4. Revised wording of the State Acceptance section on page 12 will be sent to EPA early next week.
5. Please provide background for the statements in the Comparison of Alternatives Section about possible impacts on the wetlands due to the addition of large doses of nutrients in the in situ bioremediation process.
6. The proposed remedy for the site should include an evaluation of the ongoing recovery well system and repairs/upgrades if necessary. This should be included in the proposed remedy discussion.
7. Air impacts during remediation do not appear to have been discussed in the draft Proposed Plan. Although the details of the possible impacts must be dealt with during the design work and conceptually in the Record of Decision, the Proposed Plan should consider them in the comparison of alternatives.
8. Para-dichlorobenzene is listed in the IRIS database as a Class C carcinogen—a possible human carcinogen not a probable human carcinogen. This should be reflected in the Proposed Plan, perhaps as an expanded discussion on page 4.
9. The discussion of the RI/FS results section on page 3 should be expanded to provide the public with a broader understanding of the contamination at the site. Especially, the groundwater discussion should be expanded to state that the contamination (dissolved and DNAPL) is found in the Columbia aquifer and not in the Potomac aquifer. The discussion should also state that the water supplies in the area are located in the Potomac aquifer, not in the Columbia aquifer.
10. The RI/FS results section on page 3 does not discuss the FS results. A reference to the summary of Remedial Alternatives section later in the document would resolve confusion.
11. The discussion of technical impracticability on page 4 does not appear to fit easily into this section. Perhaps its placement there should be reevaluated.
12. The slurry wall/interceptor trench discussed in Alternatives 3, 4, and 5 is a physical barrier, not a hydraulic barrier. The groundwater recovery well system proposed in Alternative 2 is a hydraulic barrier. Please make the appropriate changes in the Comparison of Alternatives section.

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13. Do the cost estimates in the Proposed Plan include revised costs to take into account the recent changes in Alternatives 3, 4A and 5?
14. Typographical and phrasing corrections were not included in these comments. The Department assumes they will be taken care of by EPA.

Specific Comments

Page 1: The title of the document should match the text. Therefore, the title should state "Proposed Remedial Action Plan" not "Proposed Plan".

Page 2, left column, paragraph 3: Insert "site" between "the" and "geology" in the first sentence.

Page 2, right column, paragraph 2: "This" in the first sentence should be changed to "SCD's". My impression is that it was SCD's investigation after the 1981 spill that revealed the groundwater contamination at the site, not the PA/SI investigations.

Page 2, right column, paragraph 4: Insert "also" between "and" and "stockpiled".

Page 3, left column, paragraph 1: The RI/FS report titles should be included in this paragraph so that the public will be able to find them in the Administrative Record.

Page 5, left column, paragraph 2: The last two sentences of this paragraph may confuse the reader by casting doubt on the results stated in the previous sentence. Perhaps this section can be reworded to eliminate this possible confusion.

Page 5, right column, paragraph 1: Due to recent correspondence from SCD clearing up questions about the ecological risk assessment, the last sentence is no longer true and should be deleted. The only purpose of the ecological monitoring is to determine the success of the remedy, not to perform another ecological risk assessment.

Page 5, right column, paragraph 5: "NPDES" should be in bold letters and defined in the Glossary.

Page 6, left column, paragraph 5: The monitoring section should state that surface water monitoring is also required.

Page 7: In situ biological treatment is mentioned in Alternatives 3 and 4 without explanation. Perhaps a reference to Alternative 5 in these sections would be appropriate.

Page 14: Expand definition of carcinogen to reflect the types of contaminants at the site.

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November 16, 1993

Ms. Kate Lose (3HW42)
U.S. EPA Region III
841 Chestnut Street
Philadelphia, PA 19107

RE: Comments on Draft Proposed Remedial Action Plan
Standard Chlorine of Delaware, Inc. Superfund Site
Delaware City, New Castle County, Delaware

Dear Ms. Lose:


This letter provides additional comments on the draft Proposed Remedial Action Plan for the Standard Chlorine of Delaware, Inc. Superfund site, as mentioned in my letter of November 12, 1993.

The additional comments/questions are:

1. Questions have been raised about the applicability of the RCRA "land ban" requirements to the storage of contaminated/treated material in the sedimentation basin on site as called for in Alternatives 3, 4A, and 4B. These questions should be resolved and if necessary, the resolution discussed in the Proposed Plan. A conference call among representatives of EPA RCRA, DNREC RCRA, yourself, and myself may be one way to address this item.
2. Alternatives 4A and 4B discuss the "delisting" of once-contaminated soils and sediments after thermal treatment. Questions have been raised as to whether delisting is the appropriate procedure to use in the activities called for in the alternatives. A conference call such as the one discussed above may be the best way to resolve this issue also, especially as both concerns are somewhat interrelated.

Please contact me about possible conference call(s) to discuss these issues or if you have any questions regarding the comments. Thank you for your help.

Sincerely,


Anne V. Hiller
Environmental Scientist III
Superfund Branch

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